

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF PUERTO RICO**

IN RE:

**NELSON VARGAS CORDERO
MARY J. RODRIGUEZ QUINONES

DEBTORS**

**CASE NO 98-10612-ESL

CHAPTER 13**

IN RE:

**NELSON VARGAS CORDERO
MARY J. RODRIGUEZ QUINONES**

PLAINTIFFS

Vs.

**COOPERATIVA DE AHORRO Y CREDITO
NUESTRA SENORA DE LA CANDELARIA;
JOHN DOE and JANE ROE;
X,Y, AND/OR Z INS. COS.**

ADV. NO.: 11-00151

**VIOLATION OF DISCHARGE
INJUNCTIVE RELIEF /
CONTEMPT/DAMAGES**

DEFENDANTS

PLAINTIFFS' MOTION TO INFORM PURSUANT TO FRCP 26(a)(3)

COME NOW, the Plaintiffs in the above-referenced adversary proceeding and in most respectfully inform and pray as follows:

1. Pursuant to Court order entered at docket 57, this proceeding is set for an evidentiary hearing on the issue of damages, scheduled for February 5, 2013 at 2:00 p.m.
2. The Plaintiffs hereby inform full compliance with all pretrial disclosure duties under Fed.R.Civ.P. 26(a). At this time, and subject to any report or disclosure to be filed by the Defendant, the Plaintiffs inform that they will rely solely on their testimony at said

hearing.

3. Plaintiffs will not call any witnesses. To the extent the Defendant introduces documents previously produced or disclosed in discovery to the Defendant, the Plaintiffs reserve their right to introduce any such documents in support of their claims for damages.
4. Nothing herein shall be construed as a waiver by Plaintiffs of their right to support any future motion or pleading with evidence, whether from documents produced in discovery or affidavits of witnesses.

Wherefore, Plaintiffs pray to this Honorable Court to take notice of the foregoing for all the legal effects it may have.

CERTIFICATE OF SERVICE

We hereby certify that a copy of the foregoing paper was sent to the U.S. Trustee and to counsel for Defendant, CandelCoop, through the Court's electronic filing system at the email address on file with the Court.

RESPECTFULLY SUBMITTED, in Arecibo, Puerto Rico this 8th day of January, 2013.

/s Edwin Matos Maldonado
EDWIN MATOS MALDONADO
USDC 226403
FELIX M ZENO GLORO
USDC 124212
LIAVANESSA FONTANEZ RUIZ
USDC 213707
PO BOX 1945 ARECIBO P.R. 00613
TEL: 787-879-1760; FAX: 880-2756
tribunal@zenogloro.com